

Headquarters

Washington, DC 20546-0001



August 31, 2004

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance at the Space Jam 2004 Event,
August 31, 2004

On August 31, 2004, the Space Foundation, Orbital Sciences, and Analytical Graphics, Inc. will be hosting a space-themed reception at Studio 450 in New York City, New York, to honor U.S. House of Representatives Majority Leader Tom DeLay and to increase the visibility of space policy at the national level. It has been determined to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

The event will be widely attended by members of Congress, congressional and White House staff members, state governors and legislators, members of the public, and industry representatives. Approximately 500-600 people are expected to attend the event, which, in addition to the hosts, will be sponsored by AIAA, Ball Aerospace & Technologies Corp., Lockheed Martin, Northrop Grumman, Boeing Co., United Space Alliance, Harris Corp., Aerojet, ATK Thiokol, the National Space Society, GPS Aerospace, Inc., and SpaceX. The cost will be approximately \$110 per person.

I find that the event meets the requirements of a widely attended gathering as defined in 5 CFR 635.204(g). The event will provide NASA employees with a forum for facilitating the widest practicable dissemination of information concerning the Agency, the U.S. civilian space programs, and educational and community outreach. I therefore conclude that NASA's interest in its employees attending this event outweighs the concerns that acceptance of the gift (reception and refreshments) may appear to improperly influence any NASA personnel in the performance of their official duties.

Accordingly, NASA invitees and their invited spouses or guests may attend this event without charge.

A handwritten signature in black ink, appearing to read "R. Andrew Falcon", written over a horizontal line.

R. Andrew Falcon